

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

XU LUN, a pseudonym,

Plaintiff,

v.

MILWAUKEE ELECTRIC TOOL
CORPORATION, et al.,

Defendants.

Case No. 2:24-cv-00803-BHL

**PLAINTIFF'S UNOPPOSED MOTION TO EXTEND TIME TO FILE REPLY IN
SUPPORT OF MOTION FOR JURISDICTIONAL DISCOVERY**

Plaintiff Xu Lun respectfully moves for a brief extension of time of seven days to file his reply in support of his motion for jurisdictional discovery. This would change the plaintiff's deadline from January 27 to February 3. Plaintiff's counsel have contacted counsel for the defendants, who do not oppose this motion. This is the plaintiff's first request for an extension of time on this brief.

Plaintiff respectfully submits that there is good cause for this request. Counsel at Gupta Wessler LLP have several pressing obligations that will occupy their time during this week and the following week. These obligations will make it difficult to properly prepare their reply absent the requested extension. Specifically, counsel have the following deadlines this week and the next:

- An oral argument in the United States Supreme Court in *McLaughlin v. McKesson*, No. 23-1226, on January 21, 2025;
- A briefing deadline in the Eastern District of New York in *Weingot v. Unison*, No. 21-cv-04542, on January 22, 2025;

- A briefing deadline in the District of Maryland in *Edmonson Community Organization v. City of Baltimore*, No. 1:24-cv-01921, on January 24, 2025;
 - A briefing deadline in the District of Massachusetts in *Pizza Hazel v. American Express Co.*, No. 24-cv-12505, on January 27, 2025;
 - A briefing deadline in the District of New Jersey in *Roberts v. Unlock*, No. 24-cv-01374, on January 29, 2025; and
 - A briefing deadline in the Missouri Circuit Court in *Williams v. Wabash National Corp.*, No. 2022-CCOO495, on January 30, 2025.
- In addition, one of the lead attorneys on this case for Gupta Wessler LLP will be attending a memorial service on January 23, 2025.

For the foregoing reasons, the plaintiff respectfully requests that this Court grant a seven-day extension of time to file the plaintiff's reply in support of his motion jurisdictional discovery.

January 22, 2025

Respectfully submitted,

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